From: <u>kira.dabby@lw.com</u>
To: <u>Cora, Lori</u>

Cc: KIRK.WILKINSON@lw.com

Subject: RE: Albina Engine and Machine Works and Dillingham purchase

Date: Tuesday, March 11, 2014 5:11:48 AM

Lori,

The information we have shared with the PCI Group on this subject during the allocation process is the same information that we shared with EPA and DOJ. Specifically, we have been unable to locate any documents setting forth the transaction by which Dillingham purchased Albina and, for that reason, we do not know the terms of that transaction.

Given DIL Trust's limited access to historical information about Dillingham's and Albina's operations over twenty-five years ago, and in order to conserve DIL Trust's funds, and in light of settlement discussions with the PCI Group and EPA, DIL Trust has not participated fully in advanced stages of the PCI Group's information gathering process. As a consequence, we do not have access to all of the information generated by other PCI Group members during this process, so it is possible that a PCI Group member has uncovered information to which we are not privy. If there is a specific document or specific information with which you are familiar, please provide it so we can follow up.

Thanks, Kira

Kira S. Dabby

LATHAM & WATKINS LLP

885 Third Avenue New York, NY 10022-4834 Direct Dial: +1.212.906.4595 Fax: +1.212.751.4864 Email: <u>kira.dabby@lw.com</u>

http://www.lw.com

From: Cora, Lori [mailto:Cora.Lori@epa.gov]
Sent: Monday, March 10, 2014 3:56 PM
To: Wilkinson, Kirk (LA); Dabby, Kira (NY)
Cc: michael.mcnulty@usdoj.gov; Shah, Hiral

Subject: Albina Engine and Machine Works and Dillingham purchase

Hello, Kirk. I've been told that information regarding the purchase and/or merger of Albina and Dillingham has been generated during the allocation process. Our 104(e) information request asked for such information and if additional information has been found, DIL Trust should supplement its response with this new information. As you know, this information is relevant to ongoing discussions about insurance recovery.

Follow @EPAnorthwest on Twitter! https://twitter.com/EPAnorthwest

To comply with IRS regulations, we advise you that any discussion of Federal tax issues in this e-mail was not intended or written to be used, and cannot be used by you, (i) to avoid any penalties imposed under the Internal Revenue Code or (ii) to promote, market or recommend to another party any transaction or matter addressed herein.

This email may contain material that is confidential, privileged and/or attorney work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

Latham & Watkins LLP